

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )

v. )

Judge Alonso  
Case No. 20 CR 585

JACOB A. MATHLEY, )

Defendant. )

**MOTION FOR CONTINUANCE OF TIME TO FILE PRE-SENTENCE  
MEMORANDUM AND SENTENCING HEARING DATE**

Defendant, JACOB A. MATHLEY, by his attorney, Robert A. Heap, respectfully moves for a continuance of the time to file his Pre-Sentence Memorandum and Sentencing date and in support thereof states:

1. This matter was heard before this Court for a Change of Plea hearing on March 8, 2022.
2. Defendant's Response to the Presentence Investigation Report was set for June 2, 2022 and a sentencing date set for June 17, 2022.
3. This attorney has been unable to complete this Response because of additional items that were needed to complete and my ability to give Mr. Mathley the time needed for him to review said Response. Further, this attorney is continuing to communicate with representatives of the victims regarding restitution. This is on-going and should be completed shortly. After a tentative agreement is reached, I will need to get authorization for acceptance from my client.
4. I am respectfully requesting additional time to complete these matters. I have discussed this request with the AUSA Mulaney and he has no objection to the continuance.
5. To further complicate this timeframe, I am out of the country for a number of weeks during the summer months. I would respectfully request a 30 day extension to file my Response with a corresponding extension for the sentencing hearing. If it would work for all parties, the second or third week of July would work in my schedule. Obviously I would be present for any date that this Court sets.

Respectfully submitted,

*Robert A Heap*

Robert A. Heap  
Attorney for Defendant

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